

REMARKS

Pursuant to 37 C.F.R. §1.111, Applicants respectfully request reconsideration of the rejections and objections set forth in the Office Action dated September 13, 2006.

Summary

Claims 11-26 are pending.

Claims 1 and 21 are currently amended.

Drawings

The Drawings were objected to under 37 C.F.R. § 1.83(a). The Applicant respectfully submits that the features of claim 21 were fully supported. However, in order to expedite prosecution, the Applicant has amended claim 21. Accordingly, the drawings are in condition for allowance and comply with 37 C.F.R. § 1.83(a).

Allowable Subject Matter

Claim 26 would be allowable if rewritten to overcome the rejection(s) pursuant to 35 U.S.C. § 112, second paragraph, set forth in the Office Action dated September 13, 2006 and include all of the limitations of the base claim and any intervening claims.

Claim Rejections – 35 U.S.C. § 112, second paragraph

Claims 11 – 26 were rejected pursuant to 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

With respect to the rejections of claims 11 – 13 pursuant to 35 U.S.C. § 112, second paragraph, claim 11 has been amended to obviate the claim rejections. Accordingly, claims 11 - 13 are in condition for allowance.

Applicant respectfully submits that there is no inconsistency between claim 18 and the specification and drawings. The original specification recites "[t]he backlight unit 45 is a three-layer structure that comprises a lower light-diffusion plate 45a and first and second prism sheets 45b. As seen in FIG. 3, the light-diffusion layer 59 is formed on a surface of the second polarizing plate 44b most proximate to the

backlight unit 45." (Paragraph 40). Accordingly, claim 18 is consistent with the specification and drawings.

Claim Rejections – 35 U.S.C. § 102(b)

Claims 11, 17, 18 and 20 – 24 were rejected pursuant to 35 U.S.C. 102(b) as being anticipated by Kameyama et al. (U.S. Patent No. 6,339,501). Claims 11 – 25 were rejected pursuant to 35 U.S.C. § 103(a) as being unpatentable over Applicant's Related Art in view of Kameyama et al.

Claim 11 recites, *inter alia*, the light-diffusion layer is disposed in contact with the second polarizing plate.

Kameyama et al. fail to disclose the light-diffusion layer is disposed in contact with the second polarizing plate. Kameyama et al. teach a contrary arrangement. Kameyama et al. teach that "light emitted from the surface light source 8 is diffused by the light-diffusing sheet 7 and the optical path of the light is controlled by the light-condensing sheet 6" (column 8, lines 61 – 64). " As a result, the light is incident on the refection type polarizing plate (polarizing member) 1 through the fine concave-convex structure 11. The light is separated into reflected light and transmitted light by the polarizing member 1" (column 8, line 64 – column 9, line 1). The concave-convex structure is part of the polarizing plate 1. Accordingly, the concave-convex structure separates light into reflected light and transmitted light. The concave-convex structure 11 does not diffuse light. Kameyama et al. teach that the light-diffusing sheet 7 diffuses the light from the light source (column 8, lines 61- 64). The light-diffusing sheet 7 is only attached to the light-condensing sheet 6 (Figure 4 of Kameyama et al.). Accordingly, claim 11 is allowable over the cited references.

As shown in Figures 1 and 2 of the present patent document, the ARA fails to disclose the light-diffusion layer disposed in contact with the second polarizing plate. The Examiner generally expressed that ARA differs from claim 11 because the ARA fails to disclose "a light-diffusion layer disposed in contact with the second polarizing plate 14b (the third passivation layer 28)" (Office Action dated September 13, 2006; page 5). Accordingly, claim 11 is allowable over the cited references.

Dependent claims 12 – 25 depend from allowable claim 11, so are allowable for at least this reason. Further limitations of the dependent claims are allowable over the cited references.

Amended claim 21 recites, *inter alia*, no additional layers are disposed between the light-diffusion layer and the backlight unit. Previously the Examiner interpreted the teachings of Kameyama et al. to disclose a "a second polarizing plate 1 below the lower substrate, the second polarizing plate having a light-diffusion layer 11 (col. 2, lines 12 – 14) on a surface thereof" (Office Action dated September 13, 2006; page 4, lines 14 – 16). Applicants respectfully disagree with this interpretation of the teachings of Kameyama et al. As discussed above, Kameyama et al. teach a contrary arrangement. However, should the Examiner maintain this interpretation, Kameyama et al. teach an arrangement that is in direct contrast to the features of claim 21. Under this interpretation, Kameyama et al. teach a light condensing sheet 6 and light diffusing sheet 7 between the concave-convex surface 11 and the light source 8. Accordingly, claim 21 is allowable over the cited references.

CONCLUSION

In view of the above, Applicants respectfully submit that the pending claims are in condition for allowance and seek an allowance thereof. If for any reason the Examiner is unable to allow the application in the next Office Action and believes that a telephone interview would be helpful to resolve any remaining issues, he is respectfully requested to contact the undersigned attorney or agent.

Respectfully submitted,



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